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June 10, 2021

VIA ECF

Hon. Valerie Caproni United States District Judge Southern District of New York 40 Foley Square, Room 240 New York, New York 10007 Elise M. Bloom Member of the Firm d +1.212.969.3410 f 212.969.2900 ebloom@proskauer.com www.proskauer.com

Re: Indigo Brunton v. EDUN-Americas, Inc., LVMH Moet Hennessey Louis Vuitton, Inc., & Julien Labat, No. 21-CV-2001 (VEC) (GWG)

Dear Judge Caproni:

We represent EDUN-Americas, Inc. and Julien Labat ("Defendants") in the above-referenced matter. We are writing on behalf of all parties and in accordance with Your Honor's Individual Practice 2(C) to request an adjournment of the initial pretrial conference and a corresponding adjournment of the deadline for pre-conference submissions.

The parties submit this request in light of ongoing settlement discussions and Your Honor's invitation to the parties to "file a joint letter requesting an adjournment of the conference." (Dkt. No. 24.) The initial pretrial conference is currently scheduled for June 25, 2021; the parties' preconference submissions are currently due on June 17, 2021. (Dkt. No. 22.) This is the parties' first request for an adjournment of the conference and the deadline for pre-conference submissions. The parties propose that the pretrial conference be adjourned until further notice and will advise the Court of the status of settlement discussions on or before August 2. Alternatively, the parties are available on the following dates for the pre-trial conference: August 13, 20, and 27, and propose that the deadline for pre-conference submissions be extended until seven (7) days prior to the date of the rescheduled conference (August 6, 13, and 20). All parties consent to this request.

For the foregoing reasons, the parties respectfully request an adjournment of the initial pretrial conference and the deadline to file their pre-conference submissions. We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Elise M. Bloom
Elise M. Bloom

cc: All counsel of record (via ECF)

Application GRANTED.

The initial pretrial conference, currently scheduled for Friday, June 25, 2021 at 2:00 P.M., is hereby adjourned to **Friday**, **August 13, 2021 at 10:30 A.M.** Pre-conference submissions are due no later than **Thursday**, **August 5, 2021**.

For the conference dial in information and the requirements of the pre-conference submissions, the parties should consult the Court's Order at docket entry 22.

SO ORDERED.

Date: June 10, 2021

HON. VALERIE CAPRONI

UNITED STATES DISTRICT JUDGE